

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE

In re:)
) Chapter 7
KEVIN J. MATTSON,) Case No. 24-20188 PGC
)
Debtor.)

**REPLY TO OBJECTION TO MOTION FOR DETERMINATION OF EXCESSIVENESS
OF PAYMENTS FOR LEGAL SERVICES RENDERED BY COUNSEL**

NOW COMES Montresor LLC, and files this Reply to Debtor's Objection to Motion for Determination of Excessiveness of Payments for Legal Services Rendered by Counsel, Pursuant to Federal Rule of Bankruptcy Procedure 2017, dated November 10, 2025 (D.E. 171).

1. Debtor Kevin J. Mattson says that Montresor's Motion is baseless and filed solely to harass him and Marcus Clegg.

2. Debtor says that all three checks referenced in the Motion bounced. Debtor's American Express checking account statement for March 2024 says that Check No. 144 for \$10,000 cleared on March 27, 2024. Debtor must be right.

3. Debtor says that Marcus Clegg ran a charge of \$12,500 on Debtor's credit card for a transfer to another law firm. It is unclear what that means or why it occurred. But okay.

4. Debtor says that Debtor made a \$5,000 payment to Marcus Clegg for services rendered to Dirigo Capital Advisors, LLC. It is unclear why Debtor, and not Dirigo Capital Advisors, LLC, made that payment to Marcus Clegg if the services were rendered for that entity and not Debtor.

5. Along those same lines, Debtor's solely owned company, Northeast Asset Management, LLC, made at least \$50,000 in payments to Marcus Clegg between May 2024 and February 2025. *See* Exhibit A. Those payments too were probably not for Debtor's benefit or legal services rendered on his behalf, so according to Debtor, that must be fine as well.

6. Northeast Asset Management, LLC, however, does routinely make payments for Debtor's personal obligations, like his monthly mortgage payment to First National Bank for

example. Sometimes it even makes payments for Debtor's wife's personal obligations, like real property taxes owed to the Town of Freeport for real estate solely owned by her. Or it just sends her money directly. *See* Exhibit B. There must be a good explanation for all that. Assuming one is even required.

7. Northeast Asset Management, LLC may have even paid Marcus Clegg the \$5,000 retainer it received in connection with Debtor's case around February 19, 2025. The firm's Rule 2016(b) Disclosure, though, says that the source of the compensation was Debtor. But if Northeast Asset Management, LLC routinely pays Debtor's personal obligations, then it is probably the same thing, and Montresor's belief that accuracy matters or even should be expected is misplaced.

8. Debtor says that he had no obligation to disclose the existence of the March 2024 payment arrangement with Marcus Clegg evidenced by the Guaranty. Debtor says it is not worth anything now anyway. He did say nine months ago that it worth \$1.4 million dollars. But okay.

9. When Montresor filed the Motion based upon the payment records in its position and its obvious misunderstanding of the requirements of 11 U.S.C. § 329 and Federal Rules of Bankruptcy Procedure 2016 and 2017, it did not believe that its Motion was a hoax or a witch hunt designed to persecute Debtor – “and his creditors”? Objection, p. 3 (emphasis added). Meaning Marcus Clegg? Not sure what other creditors Montresor would be seeking to persecute.

10. Montresor did not think Marcus Clegg could be counsel to Debtor if it was his creditor. Anyway, the point has been made. William Butler Yeats was right.

WHEREFORE, Montresor LLC requests that the Court consider the Motion, the Objection, and this Reply, and determine whether this is all fine.

Dated at Portland, Maine this 17th day of November, 2025.

/s/ Randy J. Creswell
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CERTIFICATE OF SERVICE

I hereby certify that today I served copies of the above Reply and this Certificate of Service, upon each of the parties listed on the Notice of Electronic Filing via the Court's Administrative Procedures Governing the Filing and Service by Electronic Means.

Dated at Portland, Maine this 17th day of November, 2025.

/s/ Randy J. Creswell
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